

**E X H I B I T “G”**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

WOLVERINE PROCTOR & SCHWARTZ, )  
INC. and GREAT AMERICAN )  
ALLIANCE INSURANCE CO., INC. )  
Plaintiffs, )  
)  
v. ) DOCKET NO: 04-12189RWZ  
)  
XYZ TAPE CORP., FORMERLY )  
KNOWN AS PATCO CORP., WILLIAM )  
B. WILBUR AND TRAVELERS )  
PROPERTY CASUALTY COMPANY OF )  
AMERICA )  
Defendants. )  
)

**DEFENDANT, WILLIAM B. WILBUR'S,**  
**ANSWERS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Now comes the Defendant, William B. Wilbur, and hereby answers the Interrogatories propounded by the Plaintiffs as follows:

**GENERAL OBJECTION**

1. Defendant, William B. Wilbur, objects to providing information which is protected by any privilege including, but not limited to, the attorney-client privilege.
2. Defendant, William B. Wilbur, objects to providing information protected from disclosure as its attorneys' work product including, but not limited to, the mental impressions, conclusions, opinions, legal theories of its attorneys, or constituting trial preparation materials.
3. Defendant, William B. Wilbur, objects to so much of the Interrogatories as would compel production of more information than is required by the Massachusetts Rules of Civil Procedure, or require supplementation beyond that required by the Rules.

2000 through the corporation's dissolution William Wilbur was the owner of 100% of the common stock of the corporation.

INTERROGATORY NO. 3

Please state the basis of William Wilbur's contention, if any, that William Wilbur received assets upon the dissolution of Patco under circumstances under which he would be free from liability for damages awarded to Plaintiffs as a result of this action.

ANSWER NO. 3

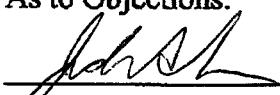
Defendant objects to this Interrogatory on the grounds that it seeks information that is irrelevant, and it is not reasonably calculated to lead to the discovery of admissible evidence, it calls for speculation or unjustified assumption of facts, it requires Defendant to accept or adopt statements or implications contained in the Interrogatory as true, accurate or complete, it calls for a legal opinion which Defendant is not qualified to give, it seeks information that is protected by the attorney-client or work product privileges and it seeks the mental impressions, conclusions, opinions, legal theories of its attorneys. Without waiving and subject to his objections, Defendant states that he did not receive assets upon the dissolution of XYZ Tape Corp.

Signed under the penalties of perjury this 15 day of March, 2005.



William B. Wilbur

As to Objections:

  
 Lee Stephen MacPhee, BBO #312400  
 Judith A. Leggett, BBO #635346  
 MORRISON MAHONEY LLP  
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 Boston, MA 02210  
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CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by ~~certified mail~~.  
 Dated: 3/14/05 